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June 25, 2024

Via ECF

Honorable Paula Xinis
United States District Court
for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770

Re: *United States v. Dejuan Marcell Leonard*, 23-441-PX

Dear Judge Xinis,

We write regarding the Motions Hearing scheduled in this case for Monday, July 1, 2024. Mr. Leonard filed three pretrial motions: a motion to suppress statements (ECF 22), a motion to suppress evidence (ECF 23), and a motion to dismiss under the Second Amendment (ECF 24). The motions to suppress are fully briefed and the parties are prepared to hold an evidentiary hearing as scheduled on Monday, July 1, 2024.

The motion to dismiss is based in large part on the Supreme Court's decision in *New York State Rifle & Pistol Association, Inc. v. Bruen*, 597 U.S. 1 (2022). As the Court is aware, last week, the Supreme Court decided *United States v. Rahimi*, No. 22-915 (June 21, 2024). The Court's analysis in *Rahimi* is material to Mr. Leonard's arguments in – and this Court's analysis of – the motion to dismiss. For this reason, undersigned counsel asks the Court to defer ruling on the motion to dismiss, to allow the defense until July 12, 2024, to file a reply on the motion.

Undersigned counsel discussed this proposal with counsel for the government, who are in agreement.

We look forward to addressing the Court on the motions to suppress on July 1, 2024.

Respectfully,

Patricia Richman and Ellie Marranzini
Office of the Federal Public Defender

cc: AUSAs Hector Gustavo Ruiz and Joel Crespo

